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 Attorneys for Defendants
 8 DENNIS J. HERRERA and CITY AND COUNTY
 9 OF SAN FRANCISCO, et al.

10
 11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

13 COMMITTEE ON JOBS CANDIDATE
 14 ADVOCACY FUND and BUILDING
 14 OWNERS AND MANAGERS
 15 ASSOCIATION OF SAN FRANCISCO
 15 INDEPENDENT EXPENDITURE
 16 POLITICAL ACTION COMMITTEE,
 16 political action committees organized
 17 under the laws of California and of the
 17 City and County of San Francisco,

18 Plaintiffs,

19 vs.

20 DENNIS J. HERRERA, in his official
 21 capacity as City Attorney of the City and
 21 County of San Francisco, KAMALA D.
 22 HARRIS, in her official capacity as
 22 District Attorney of the City and County
 23 of San Francisco, the SAN FRANCISCO
 23 ETHICS COMMISSION of the City and
 24 County of San Francisco, and CITY AND
 24 COUNTY OF SAN FRANCISCO,

25 Defendants.

26 Case No. C 07 3199 JSW

27
**DECLARATION OF ANN M.
 28 O'LEARY IN SUPPORT OF
 DEFENDANTS' OPPOSITION TO
 MOTION FOR PRELIMINARY
 INJUNCTION**

Hearing Date: September 17, 2007
 Time: 1:30 p.m.
 Place: Courtroom 2

Trial Date:

1 I, Ann M. O'Leary, declare as follows:

2 1. I am a Deputy City Attorney in the Office of City Attorney Dennis Herrera. I am
3 one of the counsel of record for City Attorney Dennis J. Herrera and have personal knowledge of
4 the matters set forth herein, unless otherwise stated, and could competently testify thereto.

5 2. Attached as Exhibit A to this declaration is a true and correct copy of the
6 following news article: Lance Williams and Chuck Finnie, Brown Nets 'Soft Money' Windfall,
7 S.F. Examiner, Sept. 7, 1999.

8 3. Attached as Exhibit B to this declaration is a true and correct copy of the
9 following news article: John Wildermuth, Soft Money Gives Brown Deeper Pockets, S.F.
10 Chron., Oct. 12, 1999, at A22.

11 4. Attached as Exhibit C to this declaration is a true and correct copy of the
12 following news article: Bob Porterfield, Better to give than to receive . . ., S.F. Bay Guardian,
13 Nov. 24, 1999.

14 5. Attached as Exhibit D to this declaration is a true and correct copy of the
15 following news article: Phillip Matier and Andrew Ross, 'Soft Money' Contributors Will Do
16 What Brown Won't, S.F. Chron., Dec. 1, 1999.

17 6. Attached as Exhibit E to this declaration is a true and correct copy of the
18 following news article: Erin McCormick, Independent Campaign Efforts Benefit Brown, S.F.
19 Examiner, Dec. 9, 1999.

20 7. Attached as Exhibit F to this declaration is a true and correct copy of the
21 following news article: Michael Warren, San Francisco's Mayor's Race Awash in Soft Money,
22 S.F. Chron., Dec. 10, 1999.

23 8. Attached as Exhibit G to this declaration is a true and correct copy of the
24 following news article: Lance Williams and Chuck Finnie, Money, Workers Gave Brown
25 Victory, S.F. Examiner, Dec. 15, 1999.

26 9. Attached as Exhibit H to this declaration is a true and correct copy of the
27 following news article: Erin McCormick and Scott Winoker, Soft Money Gave Brown A Boost,
28 S.F. Examiner, Dec. 16, 1999.

1 10. Attached as Exhibit I to this declaration is a true and correct copy of the following
 2 news article: Erin McCormick and Scott Winoker, Tab For Mayor's Landslide: \$5 Million, S.F.
 3 Examiner, Dec. 16, 1999.

4 11. Attached as Exhibit J to this declaration is a true and correct copy of the following
 5 news article: Stephanie Salter, A Hard Look at Brown's Soft Money, S.F. Examiner, Dec. 16,
 6 1999.

7 12. Attached as Exhibit K to this declaration is a true and correct copy of the
 8 following news article: Phillip Matier and Andrew Ross, Breadth of Brown's Win Beat
 9 Campaign Team's Expectation, S.F. Chron., Dec. 17, 1999.

10 13. Attached as Exhibit L to this declaration is a true and correct copy of the
 11 following news article: Bob Porterfield and A. Clay Thompson, Zoning for Sale?, S.F. Bay
 12 Guardian, January 5, 2000. Planning commission minutes demonstrating the date of the hearing
 13 on the Environmental Impact Report for the Bryant Square Project can be found at:
 14 <http://sfgov.org/site/uploadedfiles/planning/mn200001.htm#0106>. Minutes demonstrating that
 15 this project was approved by the Planning Commission can be found at:
 16 http://sfgov.org/site/planning_page.asp?id=19807

17 14. Attached as Exhibit M to this declaration is a true and correct copy of the
 18 following news article: Savannah Blackwell and Bob Porterfield, The Best Mayor Money Can
 19 Buy, S.F. Bay Guardian, February 16, 2000.

20 15. Attached as Exhibit N to this declaration is a true and correct copy of the
 21 following news article: Lance Williams and Chuck Finnie, Gusher of 'Soft Money' a Bonanza
 22 for San Francisco Mayor, May 2, 2001.

23 16. Attached as Exhibit O to this declaration is a true and correct copy of the
 24 following news article: Lance Williams, Chuck Finnie, and Jenny Strasburg, 'Juice Politics' at
 25 City Hall, July 29, 2001.

26 17. I declare under penalty of perjury, under the laws of the State of California, that
 27 the foregoing is true and correct and that if called as a witness I could competently testify
 28 thereto.

Executed this 27th day of August, 2007 at San Francisco, California.

/s/
ANN M. O'LEARY